

Introduction

On October 17, 2018 the use of recreational cannabis was legalized. The Manitoba government has passed new laws about how, where and who can buy, possess and consume cannabis in the province. These rules are similar to those in place for alcohol and tobacco, with some differences. Medical cannabis will continue to be subject to the requirement of a prescription by a Medical Doctor or Nurse Practitioner. The goal of this document is to establish a guideline interpreting for the Naturopathic profession, the *Cannabis Act*, 2018, in conjunction with the Association's regulations and standards of practice.

Definitions

Cannabis

For the purpose of this policy Cannabis is a product containing Phytocannabinoids produced by, or found in, the cannabis plant and substances that are duplicates of such phytocannabinoids, except:

- a) Derivatives of cannabis as defined in subsection 2(1) of the *Cannabis Act* that are exempt from the application of the *Cannabis Act* under the *Industrial Hemp Regulations* and that do not contain an isolated or concentrated phytocannabinoid or a synthetic duplicate of that phytocannabinoid, or
- b) Anything referred to in Schedule 2 to the *Cannabis Act* that contains no more than 10 µg/g delta-9-tetrahydrocannabinol (THC) and that does not contain an isolated or concentrated phytocannabinoid or a synthetic duplicate of that phytocannabinoid.ⁱ

For clarity, phytocannabinoids are defined as cannabinoids that occur naturally in the cannabis plant. There are 66 cannabinoids in cannabis; however, the two most commonly referred to are THC and cannabidiol (CBD).ⁱⁱ

Also for clarity, the exception in (a) refers to hemp or hemp products made by a licensee under the *Industrial Hemp Regulations*ⁱⁱⁱ and contain no THC or CBD. The exception in (b) refers to Schedule 2 of the *Cannabis Act*, which is a non-viable seed, mature stalk with no leaf, flower, seed or branch, fibre from a stalk or the root of a plant that does not contain any more than 10 µg/g of THC.

Types of Cannabis

there are three types of cannabis:

1. Non-medical (recreational) cannabis
 - a. Health care practitioner authorization not required
 - b. No pre-market review for safety, efficacy
 - c. Quality and security requirements are set out under the *Cannabis Act*;
 - d. No health claims can be made about these products.
2. Medical cannabis
 - a. Health care practitioner prescription required (Medical Doctor or Nurse Practitioner only)
 - b. No pre-market review for safety, efficacy
 - c. Quality and security requirements are set out under the *Cannabis Act*;
 - d. No health claims^{iv} can be made about these products.
3. Drugs containing cannabis
 - a. Practitioner prescription is required
 - b. Pre-market review for safety, efficacy and quality under *Food and Drug Act* (Canada)
 - c. Manufacturing subject to quality and security requirements under the *Food and Drug Act* (Canada) and *Cannabis Act*;
 - d. Can make health claims.

Prescribing

The regulations made under the *Cannabis Act* authorize **only** medical doctors and nurse practitioners to issue an authorization and complete the appropriate paperwork for medical cannabis.

Guidance

General

Members who possess the knowledge, skill and judgment specific to cannabis may where appropriate provide guidance to patients who are interested in incorporating non-medical (recreational) cannabis into their lives.

Disclaimer

Where a patient seeks guidance from a Member with regards to the use of non-medical (recreational) cannabis, the Member should ensure that the patient is aware that they are not authorized to prescribe, dispense or sell cannabis and as such can only provide general guidance on cannabis use for non-medical (recreational) purposes.

Referral

Members should advise patients to discuss the use of cannabis for health purposes with their Medical Doctor or Nurse Practitioner.

Record Keeping

Members who provide guidance to their patients on the recreational use of cannabis should ensure that discussion is documented in the patient record.

Guidance

When requested by the patient, Members may consider providing guidance in the following areas with regards to the use of non-medical (recreational) cannabis. Guidance provided should be neutral, unbiased and include general information on:

- The various types and strains;
- Potency amount and frequency
- Potential risks and benefits;
- Contraindications and considerations with regard to current medications, natural health products and health history.

Guidance should never include:

- That non-medical (recreational) cannabis is to be used for health purposes including for the treatment and management of health conditions or for therapeutic purposes;
- A specific recommendation on the type, strain, amount, frequency and/or potency that a patient should use to treat a condition;
- That a patient cease current medication in lieu of using non-medical (recreational) cannabis.

Possession

Members are not authorized to possess cannabis for professional use in their practice. Naturopathic doctors in Manitoba are not authorized to prescribe, dispense or sell recreational cannabis in their practice.

Personal Use

Members who choose to utilize cannabis for personal use should ensure that the personal use does not impact the delivery of professional services.

Recreational cannabis can only be used in a private residence and cannot be consumed in any public place, workplace or motorized vehicle.^v

ⁱ <https://www.canada.ca/en/health-canada/services/drugs-health-products/drug-products/prescription-drug-list/list.html>

ⁱⁱ News-medical reference from article

ⁱⁱⁱ <http://laws.justice.gc.ca/eng/regulations/SOR-98-156/index.html>

^{iv} A health claim is any representation in labelling or advertising that states, suggests, or implies that a relationship exists between consumption of a product or an ingredient and a person's health

^v <https://www.gov.mb.ca/cannabis/index.html>